

1 Thomas

2 anything before you landed on the floor, such
3 as a shelf or a counter or something?

4 A. Shelf.

5 Q. A shelf?

6 A. Metal. It was metal.

7 Q. That was what was on your
8 right-hand side?

9 A. Yes.

10 Q. You hit that with your right
11 arm/hand area?

12 A. With the right. Only with the
13 right.

14 Q. Did anything from the shelf or the
15 shelf itself fall?

16 A. The things were down.

17 Q. The shelves?

18 A. Yes. Like that, down (indicating).

19 Q. They fell down?

20 A. Yes. And have some things like --
21 I don't know how to explain -- like a small
22 wall.

23 Q. That was on the shelf that fell,
24 too?

25 A. No. My hand felt that.

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2 Q. Your hand hit against it?

3 A. Yes.

4 Q. Did the shelf itself fall down when
5 your arm hand hit it?

6 A. No.

7 Q. Other than the police, the
8 ambulance people and the female Circuit City
9 worker and your husband, did anyone else come
10 up to you after this had happened while you
11 were in the Circuit City store and talk to you?

12 A. No.

13 Q. The ambulance took you to Elmhurst
14 Hospital?

15 A. Right.

16 Q. Did your husband get there, too?

17 A. Of course.

18 Q. For how long were you there?

19 A. I was for five hours.

20 Q. This was in the emergency room?

21 A. Right.

22 Q. When you saw a doctor, what parts
23 of your body did you say hurt you?

24 A. Well, the doctor, you know, going
25 and coming and they said what happened. I said

1 Thomas

2 they hurt me in the hand very badly and nothing
3 she did. Only they asked me for my insurance
4 and stuff like that.

5 Q. Did they take any X-rays of you?

6 A. In Elmhurst, nothing.

7 Q. No X-rays?

8 A. No, nothing at all.

9 Q. Did they take any MRIs?

10 A. Nothing. They took when my husband
11 took me about four o'clock in the morning in
12 St. Luke's they took X-rays.

13 Q. We'll get there.

14 At Elmhurst they didn't do anything
15 any of that?

16 A. Nothing.

17 Q. Did they give you ice?

18 A. Ice.

19 Q. They put ice on your arm and wrist?

20 A. Yes.

21 Q. They give you any medication?

22 A. Nothing at all.

23 Q. After about five hours the hospital
24 said you can go?

25 A. Well, my husband was telling them,

1 Thomas

2 you going to do X-rays for my wife? Are you
3 going to check on my wife? Not yet. Not yet
4 not yet. So about 11:30 at night he took me
5 home giving me Tylenol and stuff like that.

6 Q. Do you remember what day of the
7 week that was?

8 A. I don't.

9 Q. The very next day, did you see any
10 doctor or go to any hospital?

11 A. I went to the hospital.

12 Q. That was St. Luke's?

13 A. Yes. 113th Street.

14 Q. And your husband took you there?

15 A. Yes.

16 Q. Did you go there because you still
17 had pain in your right arm and wrist?

18 A. Definitely, yes.

19 Q. Did you have pain anywhere else
20 beside your right arm --

21 A. Only my right arm (indicating).

22 Q. Only your right arm?

23 A. Yes.

24 Q. Let me re-ask the question. Let me
25 ask it first.

1 Thomas

2 On the day your husband took you to
3 St. Luke's, was the pain you were experiencing
4 still to just your right arm and hand?

5 A. Yes.

6 Q. When you got to St. Luke's that was
7 the emergency room?

8 A. Yes.

9 Q. Did you tell them what was paining
10 you?

11 A. Yes.

12 Q. That was your right arm and right
13 hand?

14 A. Yes.

15 Can I talk?

16 Q. What else did you tell them?

17 A. I told them I got hurt in Circuit
18 City.

19 Q. Anything else that you remember
20 telling them?

21 A. I went to Elmhurst Hospital and
22 they didn't do anything, that's why I came to
23 you I said.

24 Q. Did they do anything for you?

25 A. Yes.

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2 Q. What did they do?

3 A. X-rays.

4 Q. X-rays of your right arm and hand?

5 A. Yes.

6 Q. Anything else?

7 A. I don't know what else they did,
8 but I took two or four X-rays, they gave me and
9 then they put it in a cast.

10 Q. So a doctor looked at you?

11 A. Yes.

12 Q. And then he put your right arm in a
13 cast?

14 A. Right.

15 Q. Was this a hard cast or was that
16 soft cast?

17 A. I think the hard. I don't
18 remember. I had those things, but it was from
19 here to here (indicating).

20 Q. Indicating from just above your
21 right elbow down encompassing the lower portion
22 of your right hand?

23 A. (Indicating).

24 Q. Was it a wrap or was it something
25 that stayed permanently on?

1 Thomas

2 A. Permanent.

3 Q. What color was it?

4 A. White.

5 Q. When you were at St. Luke's, did
6 anybody tell you what the X-rays showed?

7 A. No. I don't remember.

8 Q. Did anyone at the hospital tell you
9 what was wrong with your right arm and hand?

10 A. No, not really, but they have my
11 records there.

12 Q. Sure.

13 Do you have an understanding of
14 what happened to your right arm and hand?

15 A. I understand -- can I say this --

16 Q. Yes. You learned later on in other
17 words?

18 A. No. I went to Dr. Kyriakides after
19 that hospital.

20 Q. Let me cut you off. We're going to
21 get to that doctor. I will give you the chance
22 then. That's fine.

23 When you were at St. Luke's that
24 day, do you remember if you learned what was
25 wrong with your right arm and if you don't

1 Thomas
2 remember, that's fine?
3 A. I don't remember.
4 Q. Fine.
5 A. Not that I don't remember. I don't
6 know.
7 Q. Did they give you any medication?
8 A. No. No.
9 Q. How long were you at St. Luke's?
10 A. Hour -- I didn't stay in the
11 hospital. About two, three hours.
12 Q. And then they sent you back home?
13 A. Yes.
14 Q. Back in December of 2006, did you
15 have a family doctor?
16 A. I have a family doctor before that,
17 too.
18 Q. In December of 2006, who was your
19 family doctor?
20 A. My family doctor is Dr. Goorny,
21 Mark Goorny, in St. Luke's. 425 9th Avenue.
22 St. Luke's Clinic and Dr. Pal. I have two
23 doctors.
24 Q. What was the name of the second
25 doctor?

1 Thomas

2 A. Dr. Carman Pal.

3 Q. Can you spell the last name?

4 A. P-A-L.

5 Q. The first doctor was Dr. Mark who?

6 A. Dr. Goorny.

7 Q. Can you spell that?

8 A. G-O-O-R-N-Y.

9 Q. Thank you.

10 A. I go until now to them.

11 Q. You still go to Dr. Goorny and

12 Dr. Pal now?

13 A. Yes.

14 Q. Is there Pal located the same place

15 as Dr. Goorny?

16 A. Same place. The eighth floor.

17 Q. Did you ever see either of those

18 doctors to talk about your right arm or hand?

19 A. Well, I go, you know, for an

20 examination and I told them what happened.

21 They said, do you have a doctor for your arm.

22 I said yes. Dr. Kyriakides.

23 Q. Very good. Thank you.

24 Dr. Goorny and Dr. Pal didn't treat

25 you for your arm?

1 Thomas

2 A. No. They are not for these things.

3 Q. Dr. Kyriakides did.

4 Before this day, did you ever hurt
5 your right shoulder, arm or hand?

6 A. No.

7 Q. Did a doctor ever treat you for any
8 problems regarding your right shoulder, arm or
9 hand?

10 A. Never. Never.

11 Q. Since this day, have you ever
12 re-injured your right shoulder, arm or hand?

13 A. No. I couldn't move it. I use my
14 left hand, which I never use my left hand.

15 Q. We will get to that.

16 MR. WHITTON: Move to strike the
17 non-responsive portions.

18 Q. Are you right-hand dominant?

19 A. Yes.

20 Q. When you were sent home from
21 St. Luke's, did they tell you anything that you
22 should do?

23 A. Yes. Don't move it. Do this and
24 that. I couldn't move it any way.

25 Q. You have to tell me what the this

1 Thomas

2 and that is.

3 A. Well, you know, in the emergency
4 room it's not like a private doctor. They
5 don't tell you everything.

6 Q. Other than telling you not to move
7 it, did they tell you anything else?

8 A. No. No.

9 Q. Did they tell you to take any type
10 of medications?

11 A. No medication.

12 Q. They tell you to use any ice?

13 A. How am I going to put the ice on
14 the cast?

15 Q. So they didn't tell you to do that?

16 A. No.

17 Q. You mentioned the name
18 Dr. Kyriakides.

19 A. Dr. Kyriakides.

20 Q. I'm going to refer that doctor as
21 Dr. K.

22 Is that okay with you?

23 MR. SEARS: It's hard for us to
24 pronounce it.

25 MR. WHITTON: Off the record.

1 Thomas

2 (Discussion held off the record.)

3 Q. After St. Luke's Hospital, where
4 was the next time you went for any type of
5 medical treatment regarding your right arm and
6 hand?

7 A. Dr. Kyriakides.

8 Q. Had you ever treated with that
9 physician before this incident?

10 A. No. I didn't know him.

11 Q. How did you come to learn of that
12 doctor?

13 A. From a lawyer.

14 Q. Would that be a lawyer in this
15 office?

16 A. No. No.

17 Q. Who was the person --

18 A. A Greek lawyer.

19 Q. A Greek lawyer. What was his name?

20 A. Latos and Latos.

21 Q. Was that person a family friend or
22 acquaintance?

23 A. No. I never knew him.

24 Q. When was the last time you saw
25 Dr. Kyriakides?

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2 A. Last week. I see him every month,
3 but I go every month for therapy. I have to go
4 at the -- at the end of this month to see
5 Dr. Kyriakides.

6 Q. So you're seeing him now,
7 approximately, once every month?

8 A. Right.

9 Q. For how long have you been seeing
10 Dr. Kyriakides, approximately, once every
11 month?

12 A. Almost a year and a half. I mean a
13 year and three months.

14 Q. Do you recall the first day that
15 you saw Dr. Kyriakides?

16 A. I don't really remember.

17 Q. When you first saw Dr. Kyriakides,
18 were you seeing him just once a month at that
19 time or more often or less often or something
20 else?

21 A. I think they give me paper and it's
22 written when I have to see the doctor and when
23 I have to go for therapy. It's every week.

24 Q. Is the therapy done in the same
25 office as Dr. Kyriakides?

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2 A. Yes. It's a big office.

3 Q. When you first went to see
4 Dr. Kyriakides, what did he do for you?

5 A. He sent me for MRI in Lenox
6 Hospital before he treat me. He has to see
7 everything before he.

8 Q. After you went for the MRI, did
9 Dr. Kyriakides speak to you about what the MRI
10 said?

11 A. Yes.

12 Q. What did he tell you?

13 A. Everything -- the nerves here.
14 They destroy my nerves of my hand (indicating).

15 Q. Talking about your right forearm
16 and hand?

17 A. Yes.

18 Q. Anything else that he told you?

19 A. Not really.

20 Q. Did he tell you what he could do
21 for you as a result of that?

22 A. Yes. He said if everything is
23 destroyed in your arm, the muscles and the
24 nerves and they did electrical tests. I was
25 jumping like that. First time.

1 Thomas

2 Q. Did he tell you the results?

3 A. I never had those things.

4 What?

5 Q. Did he tell the results of those
6 tests?

7 A. Yes. Everything is destroyed,
8 permanent damage.

9 Q. Did he tell you if there was any
10 treatment he could do for you?

11 A. Yes. He said maybe in the future I
12 do an operation.

13 Q. Did he tell you what type of
14 operation?

15 A. No.

16 Q. Did he explain what the operation
17 would do for you?

18 A. For the nerves.

19 Q. Did Dr. Kyriakides ever give you
20 any prescriptions for medication?

21 A. No. I took Ecotrin.

22 Q. I'm sorry?

23 A. Ecotrin for the pain.

24 Q. Over-the-counter?

25 A. Yes.

1 Thomas

2 Q. You buy that at a local store?

3 A. Yes. The big one.

4 Q. Dr. Kyriakides directed that you
5 have physical therapy, right?

6 A. Yes.

7 Q. Other than physical therapy and
8 sending you for the MRI and having you do the
9 electrical tests --

10 A. Right.

11 Q. -- did Dr. Kyriakides have you
12 undergo any other types of tests or treatment?

13 A. Well, when I go there every month
14 for him he check, you know.

15 Q. He examines your arm and your hand?

16 A. Yes.

17 Q. Other than examining it, does he do
18 anything else?

19 A. No. Therapy.

20 Q. The therapy, is that the same day
21 that you see Dr. Kyriakides?

22 A. No.

23 Q. Different day?

24 A. Different day.

25 Q. Presently, how often do you go for

1 Thomas

2 therapy?

3 A. Every week.

4 Q. How many times per week?

5 A. Once.

6 Q. One time per week every week?

7 A. Yes.

8 Q. You're still doing that?

9 A. Yes. Until now.

10 Q. When you go for the therapy, are
11 you seeing Dr. Kyriakides or are you seeing
12 someone else?

13 A. No. No other. Only Dr. Kyriakides
14 every month or maybe every two months.

15 Q. Does Dr. Kyriakides do your
16 physical therapy, as well?

17 A. No.

18 Q. Someone else, right?

19 A. No. He's a professional. He has
20 people to do it.

21 Q. Right.

22 Do you know the names of any of the
23 people who are doing the therapy?

24 A. Yes. Christina. She's Greek, too.
25 Some other guys.